

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SAFECO INSURANCE COMPANY OF AMERICA	:	
	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION
	:	
DEMATOS ENTERPRISES, INC., JOACQUIM	:	No. 02-CV-2899 (BWK)
DEMATOS, DONNA DEMATOS, MARIA	:	
DEMATOS, ELIZABETH DEMATOS GRYS,	:	
CHRISTOPHER PAUL GRYS,	:	
	:	
Defendants.	:	

DECLARATION OF KEVIN T. FOGERTY, ESQUIRE

COMMONWEALTH OF PENNSYLVANIA	:	
	:	S.S.
COUNTY OF LEHIGH	:	

The undersigned, Kevin T. Fogerty, being duly sworn according to law, does hereby swear, affirm and declare the following:

1. That he is an attorney licensed to practice in the Commonwealth of Pennsylvania, and is counsel of record for Safeco Insurance Company of America ("Safeco") in this case; and
2. That attached hereto as Exhibit "A" is a true and correct copy of a Personal Financial Statement for Maria DeMatos, which was delivered to Safeco's counsel by Defendants' counsel, to demonstrate and confirm Maria DeMatos' financial condition (assets and debts) as of July 31, 2002.

Sworn to and subscribed before me this
10th day of January 2003.

Notary Seal

Kevin T. Fogerty